

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ROTHSCHILD BROADCAST
DISTRIBUTION SYSTEMS, LLC,

Plaintiff,

v.

MIKU INC,

Defendant.

Case No. 3:22-cv-02946-GC-RLS

JURY TRIAL DEMANDED

Motion Returnable: August 1, 2022

**NOTICE OF DEFENDANT MIKU INC.'S
MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM**

PLEASE TAKE NOTICE that on August 1, 2022, at 9:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendant Miku Inc. will move before the Honorable Georgette Castner at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ 08608 for an Order granting its Motion to Dismiss Plaintiff's Complaint Pursuant to Fed. R. Civ. P. 12(b)(6).

PLEASE TAKE FURTHER NOTICE that Miku relies upon the Brief submitted herewith.

Dated: June 30, 2022

Respectfully submitted,

By: /s/ Warren K. Mabey, Jr.

Warren K. Mabey, Jr. (#014592010)

FISH & RICHARDSON P.C.

222 Delaware Avenue, 17th Floor

Wilmington, DE 19801

Telephone: (302) 652-5070

Facsimile: (302) 652-0607

mabey@fr.com

Neil J. McNabney (*pro hac vice* forthcoming)

Ricardo J. Bonilla (*pro hac vice* forthcoming)

Michael A. Vincent (*pro hac vice* forthcoming)

1717 Main Street, Suite 5000

Dallas, Texas 75201

(214) 747-5070 (Telephone)

(214) 747-2091 (Facsimile)

macnabney@fr.com

rbonilla@fr.com

vincent@fr.com

**COUNSEL FOR DEFENDANT
MIKU INC.**